

## **Exhibit E**

Email from R. Hickman w-discovery responses

**From:** [Ryan Hickman](#)  
**To:** [Anthony Fares](#)  
**Cc:** [Kimberly Culp](#)  
**Subject:** Re: Yuga Labs, Inc. v. Ripps, et al., Case No. 2:22-cv-04355-JFW-JEM (C.D. Cal.)  
**Date:** Thursday, September 29, 2022 10:17:10 AM  
**Attachments:** [document\\_requests.pdf](#)

---

**\*\* EXTERNAL EMAIL \*\***

Please see attached document. Kindly confirm receipt.

Thank you

# Document Request 1

Please see specific response to requests on subsequent pages. Any systems I am not administrator of, have access to or do not have a mechanism to export have not been included.

## Document Request 2

Please see specific response to requests on subsequent pages. Any systems I am not administrator of, have access to or do not have a mechanism to export have not been included.

# Document Request 3

All development conversations were over voice. There is no recorded history of those voice conversations that I am aware of. All development contributions were done via Git and documented there. There is no clean way to share the files direct other than via repo. I am not administrator, and cannot grant such access.

The screenshot shows a GitHub repository page for 'RogerPodacter / RRBAYC'. The 'Code' tab is selected, showing a list of commits. Most commits are from 'RogerPodacter' on May 24, 2022, and are associated with pull requests #61, #60, #59, #58, #57, #56, and #55. Other commits are from 'hWonderOfTheWorld' on the same date. The commits are categorized into several pull requests:

- Merge pull request #61 from RogerPodacter/events\_things ... (Verified, 6233afe)
- fix admin ui (RogerPodacter committed on May 24, 3171a08)
- Merge pull request #60 from RogerPodacter/events\_things ... (Verified, a9357ab)
- improvements (RogerPodacter committed on May 24, bedca26)
- Merge pull request #59 from RogerPodacter/events\_things ... (Verified, 4d0d791)
- copy (RogerPodacter committed on May 24, b1f87b3)
- Merge pull request #58 from RogerPodacter/events\_things ... (Verified, 10138e4)
- copy and json (RogerPodacter committed on May 24, 2960d61)
- Merge pull request #57 from RogerPodacter/events\_things ... (Verified, 07b8756)
- target blank (RogerPodacter committed on May 24, 8fdeeebe)
- embed => link (RogerPodacter committed on May 24, 76a5114)
- Merge pull request #56 from RogerPodacter/events\_things ... (Verified, 59d2d5e)
- Merge branch 'main' into events\_things (RogerPodacter committed on May 24, 159ab5e)
- merge fixes (RogerPodacter committed on May 24, 5886a3f)
- lighter (hWonderOfTheWorld committed on May 24, f7e454b)
- Merge branch 'main' into events\_things (RogerPodacter committed on May 24, 13eaf34)
- fixes (RogerPodacter committed on May 24, 86c0acd)
- tweaks (hWonderOfTheWorld committed on May 24, 21198ab)
- quick center (hWonderOfTheWorld committed on May 24, bd94df9)
- Merge branch 'main' of https://github.com/RogerPodacter/RRBAYC into main (hWonderOfTheWorld committed on May 24, 3e5d485)
- changes test (hWonderOfTheWorld committed on May 24, e848831)
- Merge pull request #55 from RogerPodacter/copy ... (RogerPodacter committed on May 24, 5ffb528)
- fix hyperlinks (RogerPodacter committed on May 24, 39d216a)
- wrap objects (hWonderOfTheWorld committed on May 24, a8a6984)
- Merge branch 'main' of https://github.com/RogerPodacter/RRBAYC into main (hWonderOfTheWorld committed on May 24, 150d41f)
- soft (hWonderOfTheWorld committed on May 24, 21301ce)

# Document Request 4

All development conversations were over voice. There is no recorded history of those voice conversations that I am aware of. All development contributions were done via Git and documented there. There is no clean way to share the files direct other than via repo. I am not administrator, and cannot grant such access.

The screenshot shows a GitHub repository page for 'RogerPodacter / RRBAYC'. The 'Code' tab is selected, showing a list of commits. A dropdown menu indicates the current branch is 'main'. The commits are dated May 24, 2022. They are grouped into several pull requests:

- Merge pull request #61 from RogerPodacter/events\_things ... (Verified, 6233afe)
- fix admin ui (RogerPodacter committed on May 24, 3171a08)
- Merge pull request #60 from RogerPodacter/events\_things ... (Verified, a9357ab)
- improvements (RogerPodacter committed on May 24, bedca26)
- Merge pull request #59 from RogerPodacter/events\_things ... (Verified, 4d0d791)
- copy (RogerPodacter committed on May 24, b1f87b3)
- Merge pull request #58 from RogerPodacter/events\_things ... (Verified, 10138e4)
- copy and json (RogerPodacter committed on May 24, 2960d61)
- Merge pull request #57 from RogerPodacter/events\_things ... (Verified, 07b8756)
- target blank (RogerPodacter committed on May 24, 8fdeeebe)
- embed => link (RogerPodacter committed on May 24, 76a5114)
- Merge pull request #56 from RogerPodacter/events\_things ... (Verified, 59d2d5e)
- Merge branch 'main' into events\_things (RogerPodacter committed on May 24, 159ab5e)
- merge fixes (RogerPodacter committed on May 24, 5806a3f)
- lighter (hWonderOfTheWorld committed on May 24, f7e454b)
- Merge branch 'main' into events\_things (RogerPodacter committed on May 24, 13eaf34)
- fixes (RogerPodacter committed on May 24, 86c0acd)
- tweaks (hWonderOfTheWorld committed on May 24, 21198ab)
- quick center (hWonderOfTheWorld committed on May 24, bd94df9)
- Merge branch 'main' of https://github.com/RogerPodacter/RRBAYC into main (hWonderOfTheWorld committed on May 24, 3e5d485)
- changes test (hWonderOfTheWorld committed on May 24, e848831)
- Merge pull request #55 from RogerPodacter/copy ... (Verified, 5ffb528)
- fix hyperlinks (RogerPodacter committed on May 24, 39d216a)
- wrap objects (hWonderOfTheWorld committed on May 24, a8a6984)
- Merge branch 'main' of https://github.com/RogerPodacter/RRBAYC into main (hWonderOfTheWorld committed on May 24, 150d41f)
- soft (hWonderOfTheWorld committed on May 24, 21301ce)

# Document Request 5

To my knowledge, I do not know how to find the “links” of memes and other content promoting ApeMarket. I do however know that this information is publicly accessible.

The only tweet I published which is readily accessible in the tools twitter platform provides relative to ApeMarket is:

hwonder (unchained) @hWonderofWorld · Jun 15

i was asked about [@ApeMarketplace](#) royalties.

for clarity: on ape market the royalties set in the collection contracts are fully supported.

apemarket does not collect royalties that are not programmed in collection contracts.

2 13 33 1

# Document Request 6

There is no written deal. Only reference is the reservation contract itself, which repays me for the up front development of the reservation system. This amount factored to ~15% based on the cost of reservations multiplied by the amount of possible reservations.

<https://etherscan.io/address/0xee969b688442c2d5843ad75f9117b3ab04b14960#code>

```
address public constant hwyPaymentAddress = 0x7D7550161E8A31D0h0585Rhac88F63Fa611af710,
address public constant paulyPaymentAddress = 0xF9C2Ba78aE44ba98888B0e9EB27EB63d576F261B;
```

```
function withdraw() external nonReentrant() {
    require(msg.sender == tx.origin, "No contracts");

    uint balance = ethAvailableToWithdraw;

    require(balance > 0, "Nothing to withdraw");

    uint paulyShare = (balance * 15) / 100;
    uint middleShare = (balance * 15) / 100;
    uint hwyShare = (balance * 15) / 100;
    uint ryderShare = balance - paulyShare - middleShare - hwyShare;

    emit Withdraw(ethAvailableToWithdraw, paulyShare, middleShare, hwyShare, ryderShare);

    ethAvailableToWithdraw = 0;

    Address.sendValue(payable(paulyPaymentAddress), paulyShare);
    Address.sendValue(payable(middlePaymentAddress), middleShare);
    Address.sendValue(payable(hwyPaymentAddress), hwyShare);
    Address.sendValue(payable(ryderPaymentAddress), ryderShare);
}
```

# Document Request 7

All development conversations were over voice. There is no recorded history of those voice conversations that I am aware of. All development contributions were done via Git. There is no clean way to share the files direct other than via repo. I am not administrator, and cannot grant such access.

The screenshot shows a GitHub repository named 'RogerPodacter / RRBAYC' with a dark theme. The 'Code' tab is selected. A dropdown menu shows the 'main' branch is selected. Below it, a section titled 'Commits on May 24, 2022' lists 21 commits. The commits are as follows:

- Merge pull request #61 from RogerPodacter/events\_things ... Verified 6233afe
- fix admin ui RogerPodacter committed on May 24 3171a08
- Merge pull request #60 from RogerPodacter/events\_things ... Verified a9357ab
- improvements RogerPodacter committed on May 24 bedca26
- Merge pull request #59 from RogerPodacter/events\_things ... Verified 4d8d791
- copy RogerPodacter committed on May 24 b1f87b3
- Merge pull request #58 from RogerPodacter/events\_things ... Verified 10136e4
- copy and json RogerPodacter committed on May 24 2960dd1
- Merge pull request #57 from RogerPodacter/events\_things ... Verified 07b8756
- target blank RogerPodacter committed on May 24 8fdeebc
- embed => link RogerPodacter committed on May 24 76a5114
- Merge pull request #56 from RogerPodacter/events\_things ... Verified 59d2d5e
- Merge branch 'main' into events\_things RogerPodacter committed on May 24 159ab5e
- merge fixes RogerPodacter committed on May 24 5886a3f
- lighter hWonderOfTheWorld committed on May 24 f7e454b
- Merge branch 'main' into events\_things RogerPodacter committed on May 24 13ef34
- fixes RogerPodacter committed on May 24 86c9acd
- tweaks hWonderOfTheWorld committed on May 24 21190ab
- quick center hWonderOfTheWorld committed on May 24 bd94df9
- Merge branch 'main' of https://github.com/RogerPodacter/RRBAYC into main hWonderOfTheWorld committed on May 24 3e5d485
- changes test hWonderOfTheWorld committed on May 24 e848831
- Merge pull request #55 from RogerPodacter/copy ... Verified 5ffb528
- fix hyperlinks RogerPodacter committed on May 24 39d216a
- wrap objects hWonderOfTheWorld committed on May 24 a8a6904
- Merge branch 'main' of https://github.com/RogerPodacter/RRBAYC into main hWonderOfTheWorld committed on May 24 158d41f
- soft hWonderOfTheWorld committed on May 24 21301ce

# Document Request 8

Documents I produced relative to my involvement in the creation, development & promotion of ApeMarket. This includes a single tweet and a site comp. Apemarket was not released.



ApeMarket ▾ Explore Pro Connect

Sell your Apes the Right way

Trade APEs at 85% less fees than Opensea

Explore

RR/BAYC BAYC MAYC BAKC DEEDS

#0 #1 #2 #3 #4 #5 #6 #7 #8 #9 #10 #11 #12 #13 #14 #15 #16 #17

Exhibit E Page 910

# Document Request 9

I earned zero royalties. There are no documents associated to any royalties. I was compensated for the development of a token reservation system. The gross total 158.28 ETH:

Sender	Amount	Latest Date
<a href="#">0xee969b688442c2d58...</a>	158.28 ETH <a href="#">\$218144.53</a>	2022-06-25

Of which 15.93 ETH was returned for gas cost:

<a href="#">0x592814ff14e030b51f6...</a>	15.93 ETH <a href="#">\$26280.83</a>	2022-07-27
--	--------------------------------------	------------

Net to build reservation system: 142.35 ETH

# Document Request 10

To my knowledge I have no accessible record to any conversation. That said, there was never a conversation to confuse, mistake or deceive anyone. There were only verbal conversations discussing the protest of the embedded racist imagery in the BAYC collection.